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Ascension Parish School District
1707 South Purpera
Gonzales, LA 70737

Marlene H Dortch, Secretary
Federal Communications Commission
Office of the Secretary
445 12th Street SW
Washington, DC 20554

September 8, 2015

RE: Request for Review of Administrator's Decision.
Docket No 02-6 Form 471 9221191, FRN 2518416 and FRN 2518302

Dear Ms. Dortch:

On April 20, 2015, BEARs for the above referenced FRNs were submitted online in anticipation of the Invoice Deadline of April 22, 2015. The Service Provider was contacted and notified of the deadline and of the online BEAR submission. The Service Provider confirmed that they would certify the BEAR before the deadline had expired.

The Service Provider did not certify the BEAR until April 30, 2015 which was after the extended deadline for invoicing. USAC did not approve the BEAR because it was certified by the Service Provider after the Invoice Deadline.

On June 30, 2015 Ascension Parish School District (Ascension) appealed the BEAR denial. On July 13, 2015 the Administrator denied Ascension's appeal, stating that it is the applicant's responsibility to ensure that all blocks of the FCC Form 472 are submitted to USAC in a timely manner.

In this situation the circumstances were beyond the control of the applicant. However, the Administrator denied the appeal based on their contention that it is up to the applicant to ensure that all blocks of the Form 472 are submitted to USAC. The applicant contacted the service provider who advised that they would certify their portion of the BEAR. The applicant's hands are tied at this point.

Denial of the BEAR presents a hardship to Ascension Parish School District, a rural school district in Louisiana. USAC's denial of the request to re-submit the BEARs will prevent the District from receiving discounts on services that they received and paid in full, according to program rules. Due to the expiration of the invoice deadline, and denial of the appeal, the only recourse for the District is to request a waiver and extension of the invoice deadline for FRNs 2518416 and FRN 2518302.

In the Bishop Perry Order, the FCC allowed correction of certain errors including failure to comply with minimum processing standards. Applicants were allowed to submit form certifications after the deadline.

The Commission may waive any provision of its rules for good cause, and in the past, the Commission has waived rules when strict compliance is not consistent with the public interest.

We understand that deadlines must exist for efficient management of the E-rate program, and if the Commission grants our waiver we are prepared to immediately re-submit the BEARs.

Respectfully submitted,



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